

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

2020 MCLAREN 600LT SPIDER; ET AL.

Defendants.

8:22CV240

APPLICATION FOR INJUNCTION

The United States of America hereby requests the Court issue an injunction pursuant to 18 U.S.C. § 983(j)(1)(A) and Rule 65 of the Federal Rules of Civil Procedure to restrain, maintain, and preserve the availability of fifteen (15) defendant properties listed in the Complaint and subject to civil forfeiture. (Docket 1). The United States seeks this injunction to preserve funds for forfeiture and to maintain and preserve vehicles and jewelry items for forfeiture pursuant to this civil action *in rem*. In support of this Application, the United States states as follows:

1. This Application seeks an injunction to enjoin Farmers NW Life Insurance and its employees and agents; Blake Cook and his employees, family members, agents and attorneys; Jeff Stenstrom and his employees, family members, agents, and attorneys; and all heirs, devisees, executors and administrators of the estate of Brett Cook (deceased), from dissipating, transferring, or spending the following property (Defendant Accounts):

- a. \$1,000,000 proceeds from the Farmers NW Life Insurance Policy Number 009138164 amount due or payable to Jeff Stenstrom; and

- b. \$1,000,000 proceeds from the Farmers NW Life Insurance Policy Number 009165409 paid out to Blake Cook as trustee of the Brett Cook Irrevocable Trust on June 7, 2022;
- c. \$180,730.10 proceeds from the Farmers NW Life Insurance Policy Number 006704990V paid out to Blake Cook as trustee of the Brett Cook Irrevocable Trust on June 7, 2022.

2. This application further seeks an injunction to enjoin any and all individuals and entities—including, but not limited to, Jeff Stenstrom and his employees, family members, agents and attorneys; Brian Cook and his employees, family members, agents, and attorneys; Blake Cook and his employees, family members, agents, and attorneys; Midwest Property Maintenance Solutions (MPMS); and all heirs, devisees, executors and administrators of the estate of Brett Cook (deceased)—from transferring title, selling, trading, using, or moving the following property (Defendant Vehicles):

- a. 2020 McLaren 600LT Spider, VIN#SBM13SAA5LW007680;
- b. 2022 GMC Sierra-K2600 AT4 4x4 Red VIN#1GT49PEYXNF163905;
- c. 2022 GMC Sierra-K2500 AT4 CC 4x4 Red VIN#1GT49PEY5NF145456.

3. This application further seeks an injunction to enjoin any and all individuals and entities—including, but not limited to, Jeff Stenstrom and his employees, family members, agents and attorneys; Brian Cook and his employees, family members, agents, and attorneys; Blake Cook and his employees, family members, agents, and attorneys; and all heirs, devisees, executors and administrators of the estate of Brett Cook (deceased)—from transferring, using, selling, trading or otherwise dissipating the following property (Defendant Jewelry):

- a. 18K white gold adjustable chain and four hearts solitaire pendants 1.03 ct HS F/VS1 GIA 14465889, 1.01 ct HS F/VS2 GIA 14913989, 1.50 ct HS D/VS1 GIA 15181577, 1.51 ct HS D/VS1 GIA 15022459;
- b. Rolex Oyster Perpetual watch 124300 Serial Number X5965319 22244;
- c. 18kt white gold wide diamond ring sq cut diamonds 5.33 emerald cut sapphires 5.74 #13604;
- d. 18kt white gold ladys ring 5 oval saph 3.00 cts micro diamonds .60;
- e. Rolex 40MM Oyster Perpetual Daytona White Mop8 watch Item Number GAAZ003732, Serial Number C3J48934;
- f. Astron SS CSHN Brace watch Item Number GEAZ002261;
- g. ¼ ctw DIA 14KW 18" station necklace Item Number CGAZ002336;
- h. 8.30 ctw DIA 18KW necklace Item Number 510Z007405;
- i. Rolex 41MM 904L Oystersteel Swiss-made Rolex Oyster Perpetual watch style number GAAZ003817, Serial Number 179E626.

4. As set forth in the Complaint, good cause exists to believe that the Defendant Accounts, Defendant Vehicles, and Defendant Jewelry derive from proceeds of wire fraud and mail fraud, committed in violation of 18 U.S.C. §§ 1341 and 1343, and are thus subject to civil forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(C). (Docket 1). Also, good cause exists to believe that the Defendant Accounts, Defendant Vehicles, and Defendant Jewelry were involved in transactions or in attempted transactions, committed in violation of 18 U.S.C. §§ 1956 and 1957 (money laundering), and are thus subject to civil forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A). *Id.*

WHEREFORE the United States of America respectfully requests that the Court enter an injunction to enjoin:

Farmers NW Life Insurance and its employees and agents; Blake Cook and his employees, family members, agents and attorneys; Jeff Stenstrom and his employees, family

members, agents, and attorneys; and all heirs, devisees, executors and administrators of the estate of Brett Cook (deceased), from dissipating, transferring, or spending the Defendant Accounts;

Jeff Stenstrom and his employees, family members, agents and attorneys; Brian Cook and his employees, family members, agents, and attorneys; Blake Cook and his employees, family members, agents, and attorneys; Midwest Property Maintenance Solutions (MPMS); and all heirs, devisees, executors and administrators of the estate of Brett Cook (deceased), from transferring title, selling, trading, using, or moving the Defendant Vehicles; and

Jeff Stenstrom and his employees, family members, agents and attorneys; Brian Cook and his employees, family members, agents, and attorneys; Blake Cook and his employees, family members, agents, and attorneys; and all heirs, devisees, executors and administrators of the estate of Brett Cook (deceased), from transferring, using, selling, trading or otherwise dissipating the Defendant Jewelry;

Until the adjudication of this civil case, as permitted under 18 U.S.C. § 983(j)(2). The United States will submit a proposed Order to the Court.

Upon the Court's entry of the Injunction, the United States will serve copies of the Application and the Court's Injunction upon the aforementioned individuals and entities.

UNITED STATES OF AMERICA,
Plaintiff

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